

1 KAMALA D. HARRIS  
Attorney General of California  
2 FRANK H. PACOE  
Supervising Deputy Attorney General  
3 LESLIE E. BRAST  
Deputy Attorney General  
4 State Bar No. 203296  
455 Golden Gate Avenue, Suite 11000  
5 San Francisco, CA 94102-7004  
Telephone: (415) 703-5548  
6 Facsimile: (415) 703-5480  
*Attorneys for Complainant*

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8 LYDIA ZANE, Senior Legal Analyst  
Telephone: (415) 703-5573  
9 Facsimile: (415) 703-5480

10 **BEFORE THE**  
11 **BOARD OF REGISTERED NURSING**  
12 **DEPARTMENT OF CONSUMER AFFAIRS**  
**STATE OF CALIFORNIA**

13 In the Matter of the Accusation Against:

14 **TONJA JENSEN**  
2120 Xavier Street # 106  
15 Bismarck, ND 58501

16 **Registered Nurse License No. 689269**

17 Respondent.

Case No.

*2013-115*

**A C C U S A T I O N**

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19 Complainant alleges:

20 **PARTIES**

21 1. Louise R. Bailey, M.Ed., RN (Complainant), brings this Accusation solely in her  
22 official capacity as the Executive Officer of the Board of Registered Nursing, Department of  
23 Consumer Affairs.

24 2. On or about September 21, 2006, the Board of Registered Nursing issued Registered  
25 Nurse License Number 689269 to Tonja Jensen (Respondent). The Registered Nurse License  
26 expired on December 31, 2007, and has not been renewed.

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4. Section 2750 of the Business and Professions Code (Code) provides, in pertinent part, that the Board may discipline any licensee, including a licensee holding a temporary or an inactive license, for any reason provided in Article 3 (commencing with section 2750) of the Nursing Practice Act.

## STATUTORY PROVISIONS

“(a) Unprofessional conduct, which includes, but is not limited to, the following:

“(4) Denial of licensure, revocation, suspension, restriction, or any other disciplinary action against a health care professional license or certificate by another state or territory of the United States, by any other government agency, or by another California health care professional licensing board. A certified copy of the decision or judgment shall be conclusive evidence of that action.”

7. Code section 125.3 provides, in pertinent part, that the Board may request the administrative law judge to direct a licensee found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

CAUSE FOR DISCIPLINE  
(Unprofessional Conduct - Out of State Discipline)  
(Bus. & Prof. Section 2761, subd. (a)(4))

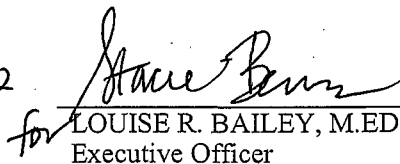
8. Respondent is subject to disciplinary action under Code section 2761, subdivision (a)(4), in that on or about March 9, 2009, the Board of Nursing of the State of North Dakota (North Dakota Board) entered a Notice of Suspension of Registered Nurse License Number R24371, issued to Respondent under the name of Tonja Schlosser, thereby suspending Respondent's license to practice as a Registered Nurse in the State of North Dakota. The underlying circumstances are that on or about March 7, 2008, Respondent entered into a Workplace Impairment Program ("WIP Agreement") with the North Dakota Board. On or about March 9, 2009, the North Dakota Board suspended Respondent's Registered Nurse's License Number R24371 for failing to comply with the Nurse Practices Act pursuant to the terms and conditions of the WIP Agreement. Such failures included injecting a resident with insulin through the resident's clothing and other medication administration errors and unsafe practices.

PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

1. Revoking or suspending Registered Nurse License Number 689269, issued to Tonja Jensen;
2. Ordering Tonja Jensen to pay the Board of Registered Nursing the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3;
3. Taking such other and further action as deemed necessary and proper.

DATED: August 9, 2012

  
for LOUISE R. BAILEY, M.ED., RN  
Executive Officer  
Board of Registered Nursing  
Department of Consumer Affairs  
State of California  
Complainant

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